

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
 v.) CRIMINAL NO. 05-10113-DPW
)
 REYLANDO REYES,)
 a/k/a REYLANDO RISE,)
 a/k/a RAYNALDO RISE,)
 a/k/a RAYLANDO RISE,)
 a/k/a RAY RISE,)
)
 Defendant.)

ASSENTED-TO MOTION TO EXCLUDE THE TIME FROM
DECEMBER 22, 2005 THROUGH FEBRUARY 17, 2006,
AND FOR AN ORDER ON EXCLUDABLE DELAY

The United States hereby moves move, pursuant to 18 U.S.C. §3161(h)(8)(A) and Section 5(c)(1)(A) of the Plan for the Prompt Disposition of Criminal Cases of the United States District Court for the District of Massachusetts, to exclude the time within which trial must commence under 18 U.S.C. §3161(c)(1), excluding from such computation all time, commencing on December 22, 2005 (date of interim status conference), and concluding on February 17, 2006 (date of by which defendant must file any dispositive motions).

As grounds therefor, the undersigned states that Counsel for Defendant, Stylianus Sinnis, Esq., has requested additional time to seek and obtain further discovery, to examine certain evidence held in the custody of law enforcement, and to file any dispositive motions. The Court has granted counsel's request and has scheduled a Final Status Conference for February 8, 2006 at

4:30 p.m., and has ordered that any dispositive motions be filed by February 17, 2006, unless defendant requests more time to file said motions.

Counsel for Defendant, Stylianus Sinnis, Esq., has given his assent to this motion.

WHEREFORE, the parties respectfully request, under 18 U.S.C. §3161(h)(8)(A) and §5(c)(1)(A) of Plan for Prompt Disposition of Criminal Cases of this Court, that this Court find, based on the above, that the ends of justice are served by granting the requested exclusion, and that said exclusion outweighs the best interest of the public and the defendants in a speedy trial, and, accordingly, exclude all time, **commencing on December 22, 2005, and concluding on February 17, 2006**, in computing the time within which trial must commence under 18 U.S.C. §3161, and request that the Court enter an Order of Excludable Delay.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By:

/s/Antoinette E.M. Leoney

ANTOINETTE E.M. LEONEY
Assistant U.S. Attorney
(617) 748-3103

Date: December 22, 2005

CERTIFICATE OF SERVICE

Suffolk, ss.

Boston, Massachusetts
December 22, 2005

I, Antoinette E.M. Leoney, Assistant U.S. Attorney, do hereby certify that I have this day served by electronic court filing a copy of the foregoing to Stylianus Sinnis, Esq., Federal

Defender Office, 408 Atlantic Avenue, 3rd Floor, Boston, MA 02110.

/s/Antoinette E.M. Leoney
ANTOINETTE E.M. LEONEY